

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSS UNIVERSITY SCHOOL OF MEDICINE, LTD.,	:
	:
Plaintiff,	:
	:
- against -	:
	:
BROOKLYN-QUEENS HEALTH CARE, INC. and	:
WYCKOFF HEIGHTS MEDICAL CENTER,	:
	:
Defendants.	:
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09 Civ. 1410 (KAM) (RLM)

JOINT STATUS REPORT

On April 15, 2013, counsel for the parties, together with Ramon Rodriguez, the CEO of Wyckoff Heights Medical Center (“Wyckoff”), and Bill Hughson, then President of the Medical Group of DeVry, Inc., the parent company of Plaintiff Ross University School of Medicine, Ltd. (“Ross”), participated in a settlement conference presided over by the Court. Following the conference, the Court issued an Order providing that “Wyckoff will make its financial records available for inspection, subject to a confidentiality agreement,” and that the “parties shall file a status report by May 20, 2013.” Following the submission of the parties’ May 20, 2013 Joint Status Report, the Court entered an Order, dated May 21, 2013, directing the filing of an updated Status Report by June 19, 2013. *See* Dkt. Nos. 146-147. In accordance with that Order, the parties jointly submit this report.

Pursuant to a Confidentiality Agreement “So Ordered” by the Court on May 17, 2013, Wyckoff produced to Ross its Audited Financial Statements for 2010 and 2011; its draft Audited Financial Statement for 2012; its Fiscal Year 2013 Annual Budget; and its Internal Operating Results for January-March 2013.

On May 24, 2013, Ross's counsel requested additional documentary detail in relation to several items in Wyckoff's May 17 disclosures. On June 3, 2013, Wyckoff's counsel responded initially to this request, which was followed, on June 14, 2013, by additional disclosures responsive to the requests. The review of these materials by Ross's consultant and the parties' discussions continue.

The parties respectfully request that the Court continue to hold in abeyance the briefing schedule for Ross's motion for reconsideration, and other proceedings in the case, pending completion of the financial record review and settlement discussions, with the parties to provide an updated status report to this Court within fourteen (14) days of this submission, or on such other date as instructed by the Court.

The undersigned has been authorized by George J. Tzanetopolous, counsel for Ross, to represent that this updated Status Report is submitted jointly by the parties.

Dated: New York, New York
June 19, 2013

Respectfully submitted,

K&L GATES LLP

By: /s/ Walter P. Loughlin

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